

June 1, 2001

**BY HAND AND ELECTRONIC MAIL**

Mary Cottrell, Secretary  
Commonwealth of Massachusetts  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

Re: **D.T.E. 99-42/43** – Interconnection Agreement Between  
Verizon and A&T Broadband (formerly MediaOne)

Dear Ms. Cottrell:

On March 15, 2001, the Department issued its Supplemental Order in D.T.E. 99-42/43-A (“Supplemental Order”), in which it addressed the outstanding issues in dispute. At the conclusion of the Supplemental Order, the Department ordered the parties to file an interconnection agreement that incorporates the Department’s rulings. On May 4, 2001, in her most recent extension of the filing deadline, Arbitrator Paula Foley established June 1, 2001, as the date by which the parties must file their interconnection agreement in this matter.

The parties, however, are still working to resolve the following four open issues: (1) Section 11.5 that will implement the Department’s ruling in the Supplemental Order with regard to AT&T Broadband's access to interoffice transmission facilities from mid-span meets; (2) Section 5.7.3 in the context of the FCC’s *Order On Remand And Report And Order*,

<sup>1</sup> which was released on April 27, 2001; (3) the pricing schedule in Attachment A, which must be thoroughly proofed by both parties; and (4) the effect, if any, of the FCC’s *Order On Remand And Report And Order* on Section 5.7.3, as well as related questions about the interpretation of the current language in the “change-in-law” provision (Section 27).

In order to demonstrate the parties’ good faith effort to meet the Department’s June 1<sup>st</sup> deadline, the parties enclose herewith, for informational purposes only, an unsigned copy of the draft agreement which includes all sections, except those mentioned in the preceding paragraph. The parties are not

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<sup>1</sup> *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Intercarrier Compensation for ISP Bound Traffic*, FCC 01-131, CC Docket Nos. 96-98 and 99-68.

Mary Cottrell, Secretary

June 1, 2001

Page

2

requesting Department approval at this time. The parties have made every attempt to ensure that the sections included in the enclosed document are accurate, but minor changes may be required before the agreement is filed for approval, if inadvertent errors or omissions are found.

Based on the above developments, the parties request that the Department extend the date for filing a signed interconnection agreement for Department approval to June 29, 2001. Should the parties determine that any one of the above issues cannot be resolved, they will notify the Department by that same date.

Thank you for your assistance in this matter.

Very truly yours,

Barbara Anne Sousa  
for Verizon

Jay E. Gruber  
for AT&T Broadband

Enclosures

cc: Service List (attached)